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10 **ATTORNEYS FOR DEFENDANTS**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DISTRICT**

14 **DAVID HOUGH, et al.**

15 *Plaintiffs,*

16 **v.**

17 **RYAN CARROLL, et al.**

18 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

**DECLARATION OF WILLIAM
SHIBLEY IN SUPPORT OF
JURISDICTIONAL DEFENDANTS'
EX PARTE APPLICATION TO
CONSIDER MOTION FOR LEAVE
TO RELEASE FUNDS**

Hearing: 12/13/24, 1:30 p.m. PT

Action Filed: April 9, 2024
Trial Date: N/A

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25 BEFORE ME, the undersigned authority, on this day personally appeared
26 **William Shibley**, and being duly sworn upon his oath by me, deposed and stated as
follows:

27 1. "My name is **William Shibley**. I am over eighteen (18) years of age, and I
28 have never been convicted of a crime. I am of sound mind and capable of making

1 this Declaration. The facts set forth herein are based on my personal knowledge and
2 are true and correct. I am competent to testify to the facts herein.

3 2. I submit this declaration in connection with and in support of Jurisdictional
4 Defendants' *Ex Parte* Application to Consider Motion for Leave to Release Funds.

5 3. I am Counsel with Lloyd & Mousilli ("**L&M**") and am licensed to practice
6 law in California. As part of my role at L&M, I handle litigation in both state and
7 federal court and I also oversee, manage, and coordinate client cases in jurisdictions
8 where there is local counsel.

9 4. On November 21, 2024, I participated in a video conference with Plaintiffs'
10 counsel, Nico Banks ("**Mr. Banks**"). During this discussion, the *Ex Parte*
11 Application to Consider the Motion to Release Funds ("**Application**") and whether
12 Plaintiffs would oppose the Application were addressed. While Plaintiff's counsel
13 opposes the substance of the motion, Plaintiff's counsel is not opposed to the
14 Motion being filed *ex parte*.

15 5. Later that same day, Mr. Banks sent emailed to confirm that Plaintiffs oppose
16 the Motion *See Exhibit A*, Nov. 21, 2024 Correspondence.

17 I declare under the laws of the State of California that the foregoing is true
18 and correct.

19 FURTHER AFFIANT SAYETH NOT.

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WILLIAM SHIBLEY

STATE OF CALIFORNIA }
COUNTY OF LOS ANGELES COUNTY }

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service in this court on this ***November 22, 2024***, via email as follows:

/s/ William Shibley
William Shibley